

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:	:	
	:	Chapter 9
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
Debtor.	:	Hon. Steven W. Rhodes
	:	

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**ASSURED GUARANTY MUNICIPAL CORP.'S  
DISCLOSURE OF FACT WITNESSES**

Pursuant to the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment [Docket No. 4202], Assured Guaranty Municipal Corp. ("Assured") by and through its undersigned counsel, hereby identifies the following witnesses and subjects that each witness will address.

1. Assured identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the confirmation hearing (the "Confirmation Hearing") on the proposed plan for the adjustment of the City's debts (the "Plan").

<b>NO.</b>	<b>NAME/TITLE</b>	<b>TESTIMONY TOPICS</b>
1.	Francis J. Coughlin, Jr, Deputy Chief Surveillance Officer, Public Finance at Assured	Assured's insurance policies with respect to the DWSD Bonds. The Plan's treatment of the DWSD Bonds. The Plan's impact on Assured.
2.	A corporate representative of the City pursuant to Fed. R. Civ. P. 30(b)(6).	Topics and matters identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].
3.	Any fact witnesses identified by the Debtor, the City of Detroit, Michigan and any parties objecting to the Plan.	Topics and matters identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].
4.	Any custodian of records necessary to authenticate documents.	Topics and matters identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].
5.	A corporate representative of the DWSD pursuant to Fed. R. Civ. P. 30(b)(6).	Topics and matters similar to those identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].

2. Assured reserves the right to amend its list of fact witnesses, or supplement the testimony topics associated with each witness referenced above, as may be necessary to address any amendments to the Plan.

3. As discovery is still being conducted in this matter, Assured reserves the right to amend this list of fact witnesses, or supplement the topics associated with each witness referenced above that come to the attention of Assured as prompted by facts learned or information obtained during the course of discovery, or by evidence presented at or before the Confirmation hearing. Assured further reserves the right to amend this disclosure based on any rulings from the Court at the pre-trial conference or otherwise.

Dated: May 12, 2014

**CHADBOURNE & PARKE LLP**

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